

**IMPERIAL PARK, LLC and,
RERUN OF TENNESSEE, LLC,**

Plaintiffs,

v.

**PENN-STAR INSURANCE COMPANY,
and/or its parent,
GLOBAL INDEMNITY GROUP, INC.,**

Defendants.

JURY DEMAND

PLEASE TAKE NOTICE that the Defendants, Penn-Star Insurance Company and Global Indemnity Group, Inc., hereby remove this case to the United States District Court for the Middle District of Tennessee, Nashville Division, pursuant to 28 U.S.C. §§. 1441 and 1446. The grounds for the removal are as follows:

Case 3:14-cv-00609 Document 1 Filed 03/06/14 Page 1 of 4 PageID #: 1

2. The suit was served on the Tennessee Department of Commerce and Insurance on February 6, 2014 and was sent to Defendants, Penn-Star Insurance Company and Global Indemnity Group, Inc. thereafter.

3. Other than the filing of the Complaint, no proceedings have taken place in this matter. This Defendants remove this action to the United States District Court for the Middle District of Tennessee, at Nashville pursuant to the provisions of 28 U.S.C. § 1441 on the grounds that this Court has jurisdiction pursuant to 28 U.S.C. §§ 1332 and 1333.

4. Plaintiff, Imperial Park, LLC alleges in the Complaint that it is a Tennessee Limited Liability Company with its principal place of business located at 1001 Rosemont Terrace, Smyrna, Tennessee 37167.

5. Plaintiff, ReRun of Tennessee, LLC also alleges in the Complaint that it is a Tennessee Limited Liability Company with its principal place of business located at 1001 Rosemont Terrace, Smyrna, Tennessee 37167.

6. Penn-Star Insurance Company is a Pennsylvania Insurance Company (Corporation) with its principal place of business in Bala Cynwood, Montgomery County, Pennsylvania.

7. Global indemnity Group, Inc. is a Delaware Corporation with its principal place of business in Bala Cynwood, Montgomery County, Pennsylvania.

8. This dispute is between persons (companies) of different states and the amount in dispute, based upon allegations made in the complaint are in excess of \$75,000.00, exclusive of costs and interest; therefore, it also meets the

jurisdictional requirements of this Court pursuant to the provisions of 28 U.S.C. § 1332(a).

9. Venue is correct herein because Plaintiffs' action is pending in Murfreesboro, Rutherford County, Tennessee.

10. Counsel for the Defendants has served on counsel for Plaintiffs a copy of this Petition for Removal and a copy of the Petition for Removal be filed in the Rutherford County Circuit Court by the Defendants within 30 days of service of the Complaint on the Defendants.

WHEREFORE, please take notice that Defendants, Penn-Star Insurance Company and Global Indemnity Group, Inc. remove the state action styled Imperial Park, LLC and ReRun of Tennessee, LLC v. Penn-Star Insurance Company and/or its Parent, Global Indemnity Group, Inc., docket number 14CV131 from the Chancery Court of Rutherford County, where it is now pending, to the United States District Court for the Middle District of Tennessee on this the 6th day of March, 2014.

Respectfully submitted,

SPICER RUDSTROM PLLC




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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, properly addressed to:

Bob Lynch, Jr.
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Suite 316
Nashville, TN 37201
(615) 255-2888
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this 6th of March, 2014.



Michael J. Vetter, Sr.